

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

**ECOPETROL AMERICA LLC'S WITNESS AND EXHIBIT LIST**

Ecopetrol America LLC ("Ecopetrol"), by and through its undersigned counsel, hereby submits this witness and exhibit list for the hearing scheduled for June 18, 2021 at 9:00 a.m. (prevailing Central Time) (the "Hearing"), before Judge Marvin Isgur at the United States Bankruptcy Court for the Southern District of Texas.

**Witnesses**

Ecopetrol may call the following witnesses:

1. Teresa Calderon, Controller, Ecopetrol America LLC;
2. Kelly E. Singer, Attorney, Squire Patton Boggs (US) LLP;
3. Rebuttal witnesses as necessary; and
4. Any witness identified or called by any other party.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

**Exhibits**

<b>No.</b>	<b>Description</b>	<b>Mark</b>	<b>Offer</b>	<b>Object</b>	<b>Admit</b>	<b>W/D</b>	<b>Disposition After Trial</b>
1.	Ecopetrol America LLC's Proof of Claim Number 455.						
2.	Emergency Motion of Debtors for Order (I) Approving Entry Into First Lien Exit Facility Commitment Letter and Related Fee Letter, (II) Authorizing Incurrence and Payment of Certain Fees and Costs in Connection Therewith, and (III) Granting Related Relief [ECF 1165].						
3.	Ecopetrol America LLC's Statement of Position and Reservation of Rights in Regards to Emergency Motion of Debtors for Order (I) Approving Entry Into First Lien Exit Facility Commitment Letter and Related Fee Letter, (II) Authorizing Incurrence and Payment of Certain Fees and Costs in Connection Therewith, and (III) Granting Related Relief [ECF 1242].						
4.	Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors [ECF 1284].						
5.	Exhibit H – Credit Bid Purchase Agreement: Disclosure Statement for Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors [ECF 1285].						
6.	Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedule of Assumed Contracts and Cure Amounts [ECF 1395].						
7.	Notice of Filing of Amended Schedule of Assumed Contracts and Cure Amounts [ECF 1456].						

8.	Declaration of Teresa Calderon in Support of Ecopetrol America LLCs Objection to (I) Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors, and (II) Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedule of Assumed Contracts and Cure Amounts [ECF 1452].						
9.	Exhibit A – Excerpt of Unit Operating Agreement: Declaration of Teresa Calderon in Support of Ecopetrol America LLCs Objection to (I) Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors, and (II) Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedule of Assumed Contracts and Cure Amounts [ECF 1452].						
10.	Exhibit B – Ecopetrol’s Joint Interest Billing Table: Declaration of Teresa Calderon in Support of Ecopetrol America LLCs Objection to (I) Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors, and (II) Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedule of Assumed Contracts and Cure Amounts [ECF 1452].						
11.	Declaration of Kelly E. Singer in Support of Ecopetrol America LLCs Objection to (I) Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors, and (II) Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedule of Assumed Contracts and Cure Amounts [ECF 1453].						
12.	Ecopetrol America, LLC’s Objection to (I) Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors, and (II) Notice to Contract Parties to Executory Contracts and Unexpired Leases of						

	the Schedule of Assumed Contracts and Cure Amounts [ECF 1455].						
13.	Notice of Filing of Second Amended Schedule of Assumed Contracts and Cure Amounts [ECF 1549].						
14.	Debtors' Opposition to Atlantic's Motion to Dismiss (Docket No. 31): Adversary Proc. No. 20-03476 [ECF 36] (Bankr. S.D. Tex. 2020).						
15.	Any document or pleading filed in the above-captioned case.						
16.	Any exhibit necessary for impeachment and/or rebuttal purposes.						
17.	Any exhibit identified or offered by any other party.						

Ecopetrol reserves the right to modify, amend, or supplement this witness and exhibit list at any time.

Dated: June 15, 2021

SQUIRE PATTON BOGGS (US) LLP

/s/ Travis McRoberts

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*Counsel for Ecopetrol America LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will serve notice on all parties registered to receive notice in these cases.

/s/ Travis A. McRoberts  
Travis A. McRoberts